

EXHIBIT 11

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

SHYRIAA HENDERSON, on behalf of
herself and all others similarly situated,

Plaintiff,

vs.

UNITED STUDENT AID FUNDS, INC.
D/B/A USA FUNDS et al.,

Defendants.

CASE NO. 3:13-cv-1845-JLS-BLM

CLASS ACTION

**DECLARATION OF NON-PARTY
WINDHAM PROFESSIONALS, INC.,
SCOTT LEVINE**

{C&M changes to draft declaration;1}

Henderson v. United Student Aid Funds, Inc. d/b/a USA Funds, No. 13-cv-1845
DECLARATION OF NON-PARTY WINDHAM PROFESSIONALS, INC.

1 I, Scott Levine, declare:

2 1. I am employed as the Director, Voice Engineering, for Windham
3 Professionals, Inc. ("Windham"). The matters stated herein are known to me by my own
4 personal knowledge and if called as a witness I could and would competently testify
5 thereto.

6 2. I am informed that Plaintiff seeks date, time and phone number ("call list")
7 with respect to telephone numbers called via the Asteria telephone system on behalf of
8 United Student Aid Funds, Inc. ("USA Funds")/Navient Solutions Inc. ("Navient") from
9 January 1, 2015 to March 31, 2016 and the LiveVox, Inc. ("LiveVox") system from
10 August 2008 to November 2013.

11 3. To Windham's knowledge, in order to produce the call list for Asteria
12 related to a USA Funds account, it would be necessary to devise and script database
13 queries to cross match the phone numbers in the call list with phone numbers in
14 Windham's collection system for USA Funds.

15 4. Windham has never performed such a cross-matching process. Such cross-
16 matching would be performed using SQL programming.

17 5. In regard to calls made by the LiveVox system, I am informed that LiveVox
18 has retained call records for calls made by Windham during the period of August 2008
19 to November 2013. In order to provide information regarding those calls made by USA
20 Funds/Navient to Plaintiff, LiveVox will need to produce all call records for the relevant
21 time period to Windham, after which Windham will need to devise and script database
22 queries to cross match phone number similar to the process to produce call records from
23 the Asteria system.

24 6. After receipt of LiveVox's call records, the cost of Windham producing the
25 final call list dialed on behalf of USA Funds from the LiveVox records is estimated at
26 \$3,000. This cost excludes the cost of LiveVox locating and transferring its call records
27 to Windham.

28 7. The cost of Windham identifying and producing the final call list of numbers

{C&M changes to draft declaration;1}

1 from the Asteria system is estimated at \$2,000.

2 I declare under penalty of perjury under the laws of the United States that the
3 foregoing is true and correct.

4 Executed on this 15th day of April, 2016 in Salem, NH.

5
6 By:


SCOTT LEVINE

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